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VIA ECF

Hon. James R. Cho
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Karnes et al v. City of New York et al.*, 21-CV-4903 (WFK) (JRC)
Extension Request

Your Honor:

Plaintiffs' counsel, with consent of defense counsel, respectfully requests (1) a *sine die* adjournment of the November 1, 2022 fact discovery deadline, and (2) a 90-day extension of the November 8, 2022 deadline to submit a status report about whether the parties would like a referral to the Court-annexed mediation program or a settlement conference. (*See* 07/21/2022 Docket Order.) The new deadline to submit the joint status report would thus be February 8, 2023. This is the second such request; the first was granted in part. (*See id.*) Granting the request would not affect any other scheduled Court appearance or deadline.

The parties submit this joint request for several reasons. Beldock Levine & Hoffman, LLP recently joined this case as co-counsel to Plaintiffs. In assessing the case, it is clear that a constellation of experts must be assembled to adequately estimate the damages involved in this matter and this process is ongoing. Plaintiffs' counsel is in the process of assembling those experts, but the expert reports will be critical to formulating a reasonable settlement demand and doubtlessly the Defendants will need some time to cogently respond.

The parties thank the Court for its attention to this matter.

Respectfully submitted,

/s/
Keegan Stephan, Esq.